

5929 Balcones Drive, Suite 200 Austin, TX 78731-4280 Phone: 512.343.2544 Fax: 512.343.0119

REDACTED - FOR PUBLIC INSPECTION

VIA ECFS

July 1, 2014

Ms. Marlene H. Dortch, Secretary Federal Communications Commission Office of the Secretary 445 12th Street, S.W. Washington, D.C. 20554

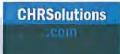
RE: REQUEST FOR CONFIDENTIAL TREATMENT - Connect America Fund, WC Docket No. 10-90; Lifeline and Link Up Reform and Modernization, WC Docket No. 11-42

Request that Information Submitted to the Commission be Withheld from Public Inspection Pursuant to 47 C.F.R. §0.459 and 5 U.S.C. §552(b)(4): Five-Year Service Quality Improvement Plan included in FCC Form 481

Confidential Financial Information – Subject to Protective Order in WC Docket Nos. 10-90, 07-135, 05-337, 03-109, CC Docket Nos. 01-92, 96-45, GN Docket No. 09-51, WT Docket No. 10-208, Before the Federal Communications Commission

Dear Ms. Dortch:

In accordance with the annual reporting requirements of 47 C.F.R. §§54.313 and 54.422, Brazos Telephone Cooperative, Inc. (the Cooperative), Study Area Code 442041, is submitting a completed FCC Form 481 to the Commission via its Electronic Comment Filing System (ECFS) in WC Docket Nos. 10-90 and 11-42. The Cooperative, by its authorized representative, hereby requests confidential treatment of two attachments to its FCC Form 481: (1) the five-year service quality improvement plan and (2) the financial annual report, both of which were redacted in the ECFS submission. The request for confidential treatment of the five-year plan is being made pursuant to section 0.459 of the Commission's rules and Exemption 4 of the Freedom of Information Act (FOIA). The request for confidential treatment of the financial annual report is being made pursuant to the FCC's November 16, 2012 Protective Order in WC Docket No. 10-90 et al. These attachments contain competitively sensitive data that Brazos Telephone Cooperative, Inc. maintains as confidential and does not normally make available to the public. Release of this information would have a substantial negative impact on the Cooperative.





Ms. Marlene Dortch July 1, 2014 Page 2

Five-Year Service Quality Improvement Plan

Pursuant to section 0.459 of the Commission's rules and Exemption 4 of FOIA, Brazos Telephone Cooperative, Inc. requests that the text and data extracted from its five-year service quality improvement plan be withheld from public inspection because it contains competitively sensitive commercial and financial information that the Cooperative keeps confidential. Public availability of this information would have a substantial negative impact on the Cooperative.

In accordance with section 0.459 of the Commission's rules, the following information is provided in support of this request:

(1) Identification of the specific information for which confidential treatment is sought:

Attachment to Line 112 of FCC Form 481 – Five-Year Service Quality Improvement Plan. Specifically, confidential treatment is sought for all information in the five-year plan related to the Cooperative's access line counts, existing broadband capabilities, and its network investment plans through 2019 that will improve service quality for its customers.

(2) Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission:

The information was submitted in WC Docket Nos. 10-90 and 11-42 as an attachment to FCC Form 481- the Carrier Annual Reporting Data Collection Form. Section 100 of FCC Form 481 requires incumbent local exchange carriers receiving high cost support to attach a five-year service quality improvement plan, pursuant to 47 C.F.R. §§54.202(a)(1)(ii) and 54.313(a)(1).

(3) Explanation of the degree to which the information is commercial or financial, or contains a trade secret or is privileged:

The five-year service quality improvement plan contains granular information on the Cooperative's access line counts and existing broadband capabilities as well as detailed plans for financial investments in its network through 2019 to improve service to subscribers. This is closely guarded, privileged information that the Cooperative does not make publicly available.

(4) Explanation of the degree to which the information concerns a service that is subject to competition:

Broadband is subject to increasing competition in the areas served by rural, rate-of-return incumbent local exchange carriers (RLECs). Virtually all RLECs face competition from one or more wireless Internet service providers. Most RLECs also face competition from at least one other wireline broadband provider such as a larger cable company, who will typically seek to "cherry pick" the lower cost portions of the study area. In addition, all RLECs face competition throughout their territories from satellite broadband providers.



Ms. Marlene Dortch July 1, 2014 Page 3

(5) Explanation of how disclosure of the information could result in substantial competitive harm:

Disclosure of the information contained in the five-year plan would provide competitors with detailed, granular information regarding the Cooperative's access line count, its existing broadband capabilities, and its strategic plans for network investments. This would give competitors invaluable confidential information with which to develop their own strategies for investing in the service area, thereby bringing substantial competitive harm to the Cooperative.

(6) Identification of any measures taken by the submitting party to prevent unauthorized disclosure:

The Cooperative has continually treated the extracted information in its five-year plan as confidential and carefully controls the information to protect it from competitors. Access to the information is limited to employees that require it and to non-employees with confidentiality obligations such as lenders, consultants, auditors, and attorneys. In addition, when such information is required to be submitted to a state regulatory authority it has been filed as confidential information, not available to the public.

(7) Identification of whether the information is available to the public and the extent of any previous disclosure of the information to third parties:

The redacted information in the five-year plan is not available to the public, and third party access is limited as described in (6) above.

(8) Justification of the period during which the submitting party asserts that material should not be available for public disclosure:

The Cooperative requests that the extracted information be withheld from public inspection indefinitely. Although the information reflects the Cooperative's service improvement plans for a five year period, it would provide a very useful baseline for competitors for several years beyond that period.

(9) Any other information that the party seeking confidential information treatment believes may be useful in assessing whether its request for confidentiality should be granted:

Exemption 4 of FOIA shields from public disclosure commercial or financial information obtained from a person that is privileged or confidential. Based on the responses provided above, the information in question satisfies this test.

Financial Annual Report

Section 3005 of FCC Form 481 requires a privately-held rate-of-return carrier receiving high cost support to attach a full and complete annual report of the Cooperative's financial condition and operations pursuant to 47 C.F.R. §54.313(f)(2). Brazos Telephone Cooperative, Inc. seeks confidential treatment of its financial annual report pursuant to the November 16, 2012 *Protective Order* in WC Docket No. 10-90, et al.¹ The *Protective Order* specifically covers information filed pursuant to 47 C.F.R. §54.313(f)(2).

¹ Connect America Fund et al., WC Docket No. 10-90 et al., Protective Order, DA 12-1857 (rel. Nov. 16, 2012).



Ms. Marlene Dortch July 1, 2014 Page 4

Brazos Telephone Cooperative, Inc. is providing to the Office of the Secretary, under seal, this cover letter and the Form 481 filing which includes the confidential information that is being requested to be withheld from public inspection.

Each page of the five-year service quality improvement plan confidential submission bears the legend, "CONFIDENTIAL - NOT FOR PUBLIC DISCLOSURE."

Each page of the financial annual report confidential submission bears the legend, "CONFIDENTIAL FINANCIAL INFORMATION – SUBJECT TO PROTECTIVE ORDER IN WC DOCKET NOS. 10-90, 07-135, 05-337, 03-109, CC DOCKET NOS. 01-92, 96-45, GN DOCKET NO. 09-51, WT DOCKET NO. 10-208, BEFORE THE FEDERAL COMMUNICATIONS COMMISSION."

Two copies of the Form 481 filing in redacted form and an accompanying cover letter are also being provided with the confidential filing. Each page of the redacted filing and accompanying cover letter is marked "REDACTED – FOR PUBLIC INSPECTION."

Two copies of this cover letter and the Form 481 filing with the confidential information are also being delivered to Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau.

The confidential information has also been submitted to the Universal Service Administrative Company through its E-File system as an attachment to the FCC Form 481.

This cover letter includes no confidential information and the text is the same in both the non-redacted and redacted versions except for the confidentiality markings.

Please contact me if you have any questions.

Sincerely,

Deb Morgan Authorized Representative for

Brazos Telephone Cooperative, Inc

DM/pjf

Enclosures

cc: Mr. Charles Tyler, Telecommunications Access Policy Division, Wireline Competition Bureau, Federal Communications Commission, (2 hardcopies of non-redacted submission)

Mr. Lonnie Rue, Brazos Telephone Cooperative, Inc. Mr. Ted Scobee, Brazos Telephone Cooperative, Inc.

FCC For	rm 481 - Carrier Annual Reporting Data Collection Form	2000 (1 - 100 - 10 - 10 - 10 - 10 - 10 -	FCC Form 481 OMB Control No. 3060-0986/OMB Control N July 2013	a. 3060-0819
<010>	Study Area Code	442941		
<015>	Study Area Name	ERAZOS TEL COOP INC		
<020>	Program Year	2015		
<030>	Contact Name: Person USAC should contact with questions about this data	Ted Scobee		
<035>	Contact Telephone Number: Number of the person identified in data line	9405647341 ext. <030>		
<039>	Contact Email Address: Email of the person identified in data line <0	30> tscobee@bratosnet.com		
ANNUA	AL REPORTING FOR ALL CARRIERS		54.313 Completion Required	54.422 Completion Required
<100>	Service Quality Improvement Reporting	(ren	(check bux when	n complete)
<200>	Outage Reporting (voice)		pplete attached worksheet)	1 V
<210>		box if no outages to report	prese different workstreety	18816
<300>	Unfulfilled Service Requests (voice)	0		111111
<310>	Detail on Attempts (voice)		17	MILLE
			(attach descriptive document)	
<320>	Unfulfilled Service Requests (broadband)	0	/	11111
<330>	Detail on Attempts (broadband)		(ottach descriptive document)	111111
<400>	Number of Complaints per 1,000 customers	(voice)		
<410>	Fixed 0.0	(voice)		
<420>	Mobile			
<430> <440>	Number of Complaints per 1,000 customers	(broadband)	/	ALLES
<450>	Mobile 0.0			
<500>	Service Quality Standards & Consumer Prote	ection Rules Compliance (ch	eck to indicate certification)	
F40	44254127310 1001	- H - 114 -		
<510>			attached descriptive document) ✓	
<600>	Functionality in Emergency Situations		eck to indicate certification)	
10002	142941tx610.pdf			
		lott	ached descriptive document)	1
<610>				
<700>	Company Price Offerings (voice)	lea	mplete attached worksheet)	12775
<710>	Company Price Offerings (broadband)		mplete attached worksheet)	11111
<800>	Operating Companies and Affiliates		mplete attached worksheet)	B B W B B C
<900>	^ ^		mplete attached worksheet)	
:1000>	Voice Services Rate Comparability		eck to indicate certification)	
1010		/a	ttach descriptive document)	
<1010>			auth descriptive doct differing	111111
<1100>	Terrestrial Backhaul (Y/N)?	lif not, c	heck to indicate certification)	11111
<1110>		(co	mplete attached worksheet)	11111
<1200>	Terms and Condition for Lifeline Customers	(co	mplete attoched worksheet)	
	Price Cap Carriers, Proceed to Price Cap Add			
2000>	Including Rate-of-Return Carriers affiliated		iers eck to indicate certification)	28838
2000>			mplete attached worksheet)	18 18 18 18 18 18 18 18
2002	Rate of Return Carriers, Proceed to ROR Add			A 76 3 3 3
3000>			eck to indicate certification)	State of State of State of State of
		Jan.	mplete attached worksheet)	J 3 6 6 8 8 8

	ervice Quality Improvement Reporting ellection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code 44	2241
<015>	Study Area Name	AZOS TEL COOP INC
<020>	Program Year	015
<030>	Contact Name - Person USAC should contact regarding this data	ed Scottee
<035>	Contact Telephone Number - Number of person identified in data line <030> 94	05647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030> ta	scolver)bracosnet.com
<110>	Has your company received its ETC certification from the FCC?	(yes / no) O
<111>	If your answer to Line <110> is yes, do you have an existing §54.202(a) "5 year plan" filed with the FCC?	(yes / no) O O
<112>	54.202(a) "5 year plan" on file with the FCC, as it relates to your provision of voice telephony service. Attach Five-Year Service Quality Improvement Plan or, in subsequent years, your annual progress report filed pursuant to 47 C.F.R. § 54.313(a)(1). If your composite which only receives frozen support, your progress report is only required to address voice telephony service.	442041tx112.pdf pany is a
	Please check these boxes below to confirm that the attached documents(s), on line 112, contains a progress report on its five-year service quality improvement plan pursuant to § 54.202(a). The information shall be submitted at the wire center level or census block as appropriate.	Name of Attached Document
<113>	Maps detailing progress towards meeting plan targets	
<114>	Report how much universal service (USF) support was received	
	How (USF) was used to improve service quality	
<115>		
	How (USF)was used to improve service coverage	
<115> <116> <117>	How (USF) was used to improve service coverage How (USF) was used to improve service capacity	

(200) Service Outage Reporting (Voice)
Data Collection Form

<220>

FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	4-2041
<015>	Study Area Name	PRAZOS TEL COOP INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scoped
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	twother bbrazownet.com

<a>>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<c1></c1>	<c2></c2>	<d></d>	<e></e>	<f></f>	<g></g>	<h></h>
NORS teference umber	Outage Start Date	Outage Start Time	Outage End Date	Outage End Time	Number of Customers Affected	Total Number of Customers	911 Facilities Affected (Yes / No)	Service Outage Description (Check all that apply)	Did This Outage Affect Multiple Study Areas (Yes / No)	Service Outage Resolution	Preventativ Procedures

							»—————————————————————————————————————				
							-				

	ce Offerings including Voice Rate Data lection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	442041	
<015>	Study Area Name	BRAZOS TEL TOOP INC	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scopes	
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	racobee brazosnet com	
<701>	Residential Local Service Charge Effective Date 1 1/2014		
<702>	Single State-wide Residential Local Service Charge		

03>	<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<b5></b5>	<c></c>
	State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fe
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-									
-									
-									
-					See at	tached worksheet			
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-									
-									
-									

(710) Broadband Price Offerings	FCC Form 481
Data Collection Form	OMB Control No. 3060-0986/OMB Control No. 3060-0819
	July 2013

<010>	Study Area Code	442041
<015>	Study Area Name	BRAZOS TEL COUP INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Ted scopee
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405547341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	Lacobeenbrazosnet.com

711>	<a1></a1>	<a2></a2>	<b1></b1>	<b2></b2>	<e></e>	<d1></d1>	<d2></d2>	<d3></d3>	<d4></d4>
	State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rate and Fees	Broadband Service - Download Speed (Mbps)	Broadband Service - Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select
				See attac	hed				
				worksheet -					
-									

	erating Companies lection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-081 July 2013
<010>	Study Area Code	442041		
<015>	Study Area Name	BRAZOS TEL CO-	OF INC	
<020>	Program Year	2015	10 A.Resis	
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobes		
<035>-	Contact Telephone Number - Number of person identified in data line <030>	9405647341 cz	ι.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobec brazo	osnet.com	
<810>	Reporting Carrier Erazos Telephone Cooperative, Inc.			
<811>	Holding Company			
<812>	Operating Company Reason Telephone Cooperative, Inc.			
<813>	<a1></a1>	, and a stay of the stay of the	<a2></a2>	<a3></a3>
	Affiliates		SAC	Doing Business As Company or Brand Designation
,				

	bal Lands Reporting lection Form		FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010>	Study Area Code	44,041	
<015>	Study Area Name	BRAZOS TEL COOP INC	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobee	
<035>	Contact Telephone Number - Number of person identified in data line <03)> 9405647341 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <03	O> tacobee brasoaner cor	0
<910>	Tribal Land(s) on which ETC Serves		
<920>	Tribal Government Engagement Obligation		Name of Attached Document
			Name of Attached Document
	company serves Tribal lands, please select (Yes, No, NA) for each these boxes		
	rm the status described on the attached document(s), on line 920,	Select	
	strates coordination with the Tribal government pursuant to	(Yes,No,	
9 54.31.	3(a)(9) includes:	NA)	
<921>	Needs assessment and deployment planning with a focus on Tribal		
<922>			
<923>	Feasibility and sustainability planning; Marketing services in a culturally sensitive manner;		
<924>			
<924>	Compliance with Rights of way processes		
	Compliance with Land Use permitting requirements		
<926>	Compliance with Facilities Siting rules		
<927>	Compliance with Environmental Review processes		
13202	Compliance with Cultural Preservation review processes Compliance with Tribal Business and Licensing requirements.		

Maria de maria de la compansión de la co	o Terrestrial Backhaul Reporting lection Form			FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013		
<010>	Study Area Code		141.041			
<015>	Study Area Name		FRAZOS TEL COOP INC			
<020>	Program Year		2015			
<030>	Contact Name - Person USAC should contact regarding this data		Ted Scobee			
<035>	Contact Telephone Number - Number of person identified in data line <030>		9405£17341 ext.			
<039>	Contact Email Address - Email Address of person identified in data line <	030>	tacobos bracosast com			
<1120>	Please check this box to confirm no terrestrial backhaul options exist within the supported area pursuant to § 54.313(G)]				
<1130>	Please check this box to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54,313(G)					

<035> Contact Tele <039> Contact Emi <1210> Terms & Co <1220> Link to Pub "Please check these box or the website listed, on § 54.422(a)(2) annual reannually report: <1221> Information	Name Pear me - Person USAC should contact regarding this data pephone Number - Number of person identified in data line <030> pail Address - Email Address of person identified in data line <030> penditions of Voice Telephony Lifeline Plans		Name of Attached Document
<020> Program Yes <030> Contact Nam <035> Contact Tele <039> Contact Ema <1210> Terms & Contact Ema <1220> Link to Pub "Please check these box or the website listed, on § 54.422(a)(2) annual reannually report: <1221> Information	me - Person USAC should contact regarding this data ephone Number - Number of person identified in data line <030> ail Address - Email Address of person identified in data line <030> onditions of Voice Telephony Lifeline Plans	2015 led Scobee 9405647341 ext.	Name of Attached Document
<030> Contact Nar <035> Contact Tele <035> Contact Tele <039> Contact Emi <1210> Terms & Co <1220> Link to Pub "Please check these box or the website listed, on § 54.422(a)(2) annual reannually report: <1221> Information	me - Person USAC should contact regarding this data ephone Number - Number of person identified in data line <030> ail Address - Email Address of person identified in data line <030> onditions of Voice Telephony Lifeline Plans	2015 led Scobee 9405647341 ext.	Name of Attached Document
<035> Contact Tele <039> Contact Emi <1210> Terms & Contact Emi <1220> Link to Pub "Please check these box or the website listed, on § 54.422(a)(2) annual reannually report: <1221> Information	ephone Number - Number of person identified in data line <030> iail Address - Email Address of person identified in data line <030> onditions of Voice Telephony Lifeline Plans	led Scobee 9405647341 ext.	Name of Attached Document
<039> Contact Emiles <1210> Terms & Contact Emiles <1220> Link to Public "Please check these box or the website listed, on § 54.422(a)(2) annual reannually report: <1221> Information	onail Address - Email Address of person identified in data line <030>		Name of Attached Document
<1210> Terms & Co <1220> Link to Pub "Please check these box or the website listed, on § 54.422(a)(2) annual reannually report: <1221> Information	onditions of Voice Telephony Lifeline Plans	tscobeerbrazesest.com	Name of Attached Document
<1220> Link to Pub "Please check these box or the website listed, on § 54.422(a)(2) annual re annually report: <1221> Information			Name of Attached Document
"Please check these box or the website listed, on § 54.422(a)(2) annual re annually report: <1221> Information			Name of Attached Document
or the website listed, on § 54.422(a)(2) annual reannually report: <1221> Information	blic Website HTTP	www.buazosnet.com/telephone	Hame of Accountering
	exes below to confirm that the attached document(s), on line 1210, in line 1220, contains the required information pursuant to reporting for ETCs receiving low-income support, carriers must		
	n describing the terms and conditions of any voice service plans offered to Lifeline subscribers,		
<1222> Details on t	the number of minutes provided as part of the plan,		
<1223> Additional c			

	ice Cap Carrier Additional Documentation		FCC Form 481		
Data Coll	ection Form		OMB Control No. 3060-0986/OMB Control No. 3060-		
Including Rate-of-Return Carriers offiliated with Price Cap Local Exchange Carriers			July 2013		
<010>	Study Area Code	442041			
<015>	Study Area Name	BRAZOS TEL COOP INC			
<020>	Program Year	2015			
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobee			
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.			
<039>	Contact Email Address - Email Address of person identified in data line <030>	rscobee-biacosuer.com			
CHECK ti	e boxes below to note compliance as a recipient of Incremental Connect Amer	ca Phase I support, frozen High Cost suppor	t, High Cost support to offset access charge reductions, and Connect America Phase II		
	support as set forth in 47 CFR § 54.313(b),(c),(d),(i	 the information reported on this form and 	d in the documents attached below is accurate.		
	Incremental Connect America Phase I reporting				
<2010>	2nd Year Certification (47 CFR § 54.313(b)(1))				
<2011>	3rd Year Certification {47 CFR § 54.313(b)(2)}				
	Price Cap Carrier Receiving Frozen Support Certification (47 CFR § 54.312(a))				
<2012>	2013 Frozen Support Certification				
<2013>	2014 Frozen Support Certification				
<2014>	2015 Frozen Support Certification				
<2015>	2016 and future Frozen Support Certification				
	Price Cap Carrier Connect America ICC Support (47 CFR § 54.313(d))		22		
<2016>	Certification Support Used to Build Broadband				
	Connect America Phase II Reporting (47 CFR § 54.313(e))				
<2017>	3rd year Broadband Service Certification				
<2018>	5th year Broadband Service Certification				
<2019>	Interim Progress Certification				
<2020>	Please check the box to confirm that the attached document(s), on pursuant to § 54.313 (e)(3)(ii), as a recipient of CAF Phase II support addresses of community anchor institutions to which began providing receding calendar year.	ine 2021, contains the required informa shall provide the number, names, and ng access to broadband service in the	ition		
<2021>	Interim Progress Community Anchor Institutions	478			
		-	of Attached Document Listing Required Information		

sooo) Ka	te Of Return Carrier Additional Documentation	14	FCC Form 481
ata Coll	ection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		The second secon	July 2013
· (mar		observed to the	
<010>	Study Area Rome	842041 BRANOS TEL COCP INC	
<020>	Program Year	2015	
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scoree	
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.	
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobce?brazognet_com	
	he boxes below to note compliance on its five year service quality plan (pursuar CFR § 54.313(f)(2). I further certify that the		ring compliance with the financial reporting requirements set forth in 47
		and the second s	
(3010)	Progress Report on 5 Year Plan		
(3010)	Milestone Certification (47 CFR § 54 313(f)(1)(i))		
	Control of the contro	Name of Attached Document Listing Required Inf	nemation
		Name of Attached Document Listing Required in	ormation
(3011)	Please check this box to confirm that the attached document(s), on line 3 § 54.313 (f)(1)(ii), the carrier shall provide the number, names, and addreproviding access to broadband service in the preceding calendar year.	012 contains the required information pursuant to sses of community anchor institutions to which began	
(3012)	Community Anchor Institutions (47 CFR § \$4.313(f)(1)(ii))	14	
	ts your company a Privately Held ROR Carrier (47 CFR § \$4.313(f)(2)) If yes, does your company file the RUS annual report	Name of Attached Document Listing Required Information (Yes/No) (Yes/No)	88
Please	check these boxes to confirm that the attached document(s), on line 301	contains the required information pursuant to § 54.313	3(f)(2) compliance requires:
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		
(3016)	Document(s) for Balance Sheet, Income Statement and Statement of Ca	sh Flows	
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation		
		Name of Attached Document Listing Required Information	60
(3013)	If the response is no on line 3014, is your company audited?	(Yes/No)	
	If the response is yes on line 3018, please check the boxes below to		
(20120)	confirm your submission, on line 3026 pursuant to § 54.313(f)(2), contains		
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a fo	ormat comparable to RUS Operating Report for Telecommunic	cations 🗸
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of C	ash Flows	
(3021)	Management letter issued by the independent certified public accountant, that		
(3021)	If the response is no on line 3018, please check the boxes below to confirm your submission, on line 3026 pursuant to § 54.313(f)(2),	performed the company armanism audit.	
	contains;		
(3022)	independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications		
(3023)	Borrowers, Underlying information subjected to a review by an independent certified		
	public accountant		
(3024)	Underlying information subjected to an officer certification.		
(3025)	Document(s) for Balance Sheet, Income Statement and Statement of Ca		
		442041tx3026 pdf	
(3026)	Attach the worksheet listing required information		- 1

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013

<010>	Study Area Code	442041
<015>	Study Area Name	BRAZOS TEL COOP INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobee
<035>	Contact Telephone Number - Number of person identified in data line <030>	340564/241 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobee@biacosnet.com

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
<010> Study Area Code	442041
<015> Study Area Name	BRAZOS TEL COOP INC
<020> Program Year	2015

Ted Scokee

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

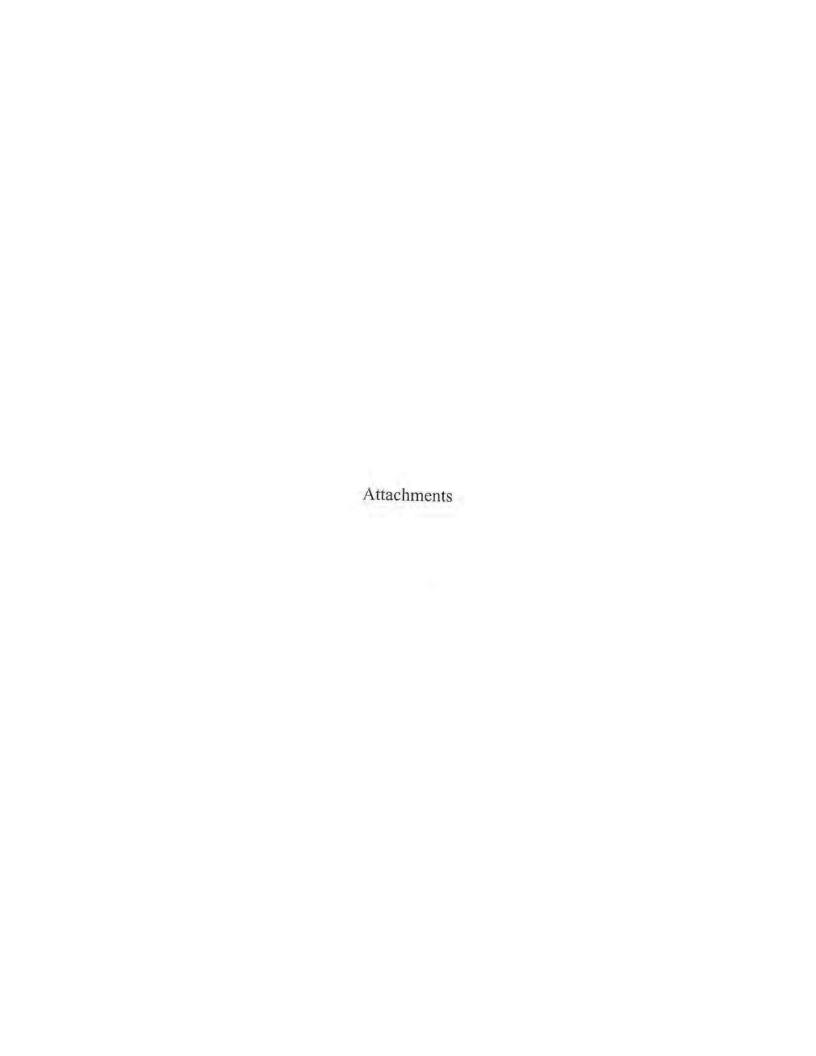
certify that (Name of Agent) <u>Deb Korgan</u> also certify that I am an officer of the reporting carrier; my respeagent; and, to the best of my knowledge, the reports and data p	is authorized to submit the information reported on behalf of the reporting carrier. onsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized royided to the authorized agent is accurate.
Name of Authorized Agent: Deb Morgan	
Name of Reporting Carrier: BRANOS TEL COOP INC	
Signature of Authorized Officer: CERTIFIED ONLINE	Date: 07/01/2014
Printed name of Authorized Officer: Lonnie Rue	
Title or position of Authorized Officer: CEO	
Telephone number of Authorized Officer: 9405615659 ext.	
Study Area Code of Reporting Carrier: 442041	Filing Due Date for this form: 07/01/2014

TO BE COMPLETED BY THE AUTHORIZED AGENT:

<030> Contact Name - Person USAC should contact regarding this data

<035> Contact Telephone Number - Number of person identified in data line <030> 9305647341 ext.
<039> Contact Email Address - Email Address of person identified in data line <030> tscobee /brazosnet.com

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipier	its on benait of Reporting Carrier
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the informati	
Name of Reporting Carrier: BRAZOS TEL COOP INC	
Name of Authorized Agent or Employee of Agent: Deb Moxgan	
Signature of Authorized Agent or Employee of Agent: CERTIFIED ONLINE	Date: 07/01/2014
Printed name of Authorized Agent or Employee of Agent: Deb Norgan	
Title or position of Authorized Agent or Employee of Agent Kanager Business Compliance	
Telephone number of Authorized Agent or Employee of Agent: 5126537705 ext.	
Study Area Code of Reporting Carrier: 442941 Filing Due Date for this form: 97/01/3	014



(700) Price Offerings including Voice Rate Data Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	142041
<015>	Study Area Name	BPAZOS TEL COOP INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scoree
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405447341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscobee brazosnet com

<701> Residential Local Service Charge Effective Date <702> Single State-wide Residential Local Service Charge 1/1/2014

<703>

<a1></a1>	<a2></a2>	<a3></a3>	<b1></b1>	<b2></b2>	<b3></b3>	<b4></b4>	<bs><</bs>	<c></c>
State	Exchange (ILEC)	SAC (CETC)	Rate Type	Residential Local Service Rate	State Subscriber Line Charge	State Universal Service Fee	Mandatory Extended Area Service Charge	Total per line Rates and Fe
TX	Archer City		EH	14.23	0.0	0.58	4.1	19.01
TX	Bryson		FR	14.23	0.0	0.55	3.5	18.39
TX	Elbert		FR	14.08	0 11	0.65	3.5	18.23
XT	Eliasville		FR	14.08	0.0	0.65	3.5	18.23
TX	Jermyn		FR	14.23	0 0	0.66	3.5	18,39
TX	Loving		FR	14.08	0 0	0.65	3.5	18.23
TX	Newcastle		FR	14.23	0.0	0.56	3.5	18.39
TX	Olney		FR	15.95	0.0	0 59	0.0	16.54
XT	Orth		FR	14.08	0.0	05	3.5	18.23
XT	Woodson		FR	14.08	0.0	0.65	3.5	18.23

(710) Broadband Price Offerings Data Collection Form

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	442041
<015>	Study Area Name	BRAZOS TEL CCOP INC
<020>	Program Year	2015
<030>	Contact Name - Person USAC should contact regarding this data	Ted Scobee
<035>	Contact Telephone Number - Number of person identified in data line <030>	9405647341 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	tscheafbrazonet.com

State	Exchange (ILEC)	Residential Rate	State Regulated Fees	Total Rates and Fees		Broadband Service -Upload Speed (Mbps)	Usage Allowance (GB)	Usage Allowance Action Taken When Limit Reached (select)
TX	All	59.95	0.0	59.95	e.0	2.0	0.0	Other, No limit on usage allowand
TΣ	A11	79.95	0.0	79.95	10.0	2.0	0.0	Other, No limit on usage allowand
TX	A11	149.95	0.0	149.95	30.0	3,6	0.0	Other, No limit on usage allowand
TX	A11	209.95	0.0	209.95	50.0	5.0	0.0	Other, No limit on usage allowand
		-						
						1480	•	

LINE 112 - FIVE-YEAR SERVICE QUALITY IMPROVEMENT PLAN

Following is the initial five-year service quality improvement plan for Valliant Telephone Company, Inc. ("Valliant" or "the Company") pursuant to 47 C.F.R. § 54.202(a)(1)(ii) that requires an eligible telecommunications carrier (ETC) to describe proposed improvements or upgrades to the ETC's network throughout its service area. The *USF/ICC Transformation Order* establishes a public interest obligation for rate-of-return ETCs to provide broadband service at speeds of at least 4 Mbps downstream and 1 Mbps upstream (4:1) "upon reasonable request." A service quality improvement plan cannot project where in the service area reasonable requests will be made. However, the proposed network expenditures in this plan ensure the continuation of high-quality voice and broadband services within the Company's service territory.

Although this plan is a good faith effort by the Company, it is subject to change, given the uncertainty faced by ETCs regarding whether capital investments will be recoverable over the five year planning horizon. Factors that may affect the capital improvements plan include erosion of the customer base due to competition, alternative technologies, economic conditions in the service area, and unpredictable changes in the universal service support amounts an ETC receives.

Valliant owns and operates three exchanges serving subscribers in the southeastern Oklahoma. The service area includes portions of Chocktaw, McCurtain, and Pushmataha counties. The Company's service area covers approximately 222 square miles.

Baseline Network Description



Table 1 - Current Broadband Capabilities

Exchange Name	Total Square Miles	Total Existing Access Lines	Estimated Total Population Served	Broadband Capable Lines	Estimated Broadband Capable Population	% Broadband Capable

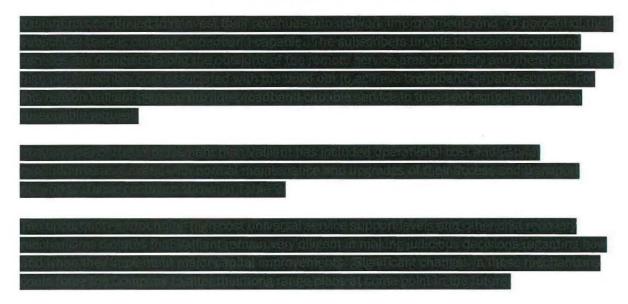
2014 - 2019 Service Quality Improvement Plan

Table 2 provides Valliant's intended service quality improvements and associated capital expenditures for 2014 – 2019, by exchange, along with estimates of the population that will be served by the improvements.

Table 2 - Service Quality Improvement Plan

Exchange	Description of Improvement	2014	2015	2016	2017	2018	2019	Estimated Population Served by Improvements
							n de la constant	
			7.8 3.4		R.D.W			

Narrative Description: 2014 - 2019



LINE 510 - SERVICE QUALITY STANDARDS AND CONSUMER PROTECTION RULES COMPLIANCE

Brazos Telephone Cooperative, Inc. complies with applicable service quality standards and consumer protection rules as required by the state regulatory commission and the Federal Communications Commission.

The rates, terms, and conditions under which the Cooperative operates are outlined in its Local Exchange Tariff, which is approved by the state commission. The Cooperative's tariff contains provisions regarding its customer service and protection practices, including resolving disputes with the Cooperative, applying for service, the classification of business and residential rates, deposits, billing and payment for service, refusal, disconnection and cancellation of service. The tariff is available for customer review in the Business Office, as requested. Rates and terms of service are disclosed to customers upon application for service both verbally and in writing as part of a packet of information for new customers. Rates, applications and certain terms of service are also available on the Cooperative's website.

Service quality standards are established by the state commission and the Cooperative consistently meets or exceeds the standards and provides reports to the state commission, in accordance with the state commission's rules.

The protection of customers' privacy and information is of utmost importance and the Cooperative has a policy and established operating procedures that comply with the FCC's Customer Proprietary Network Information (CPNI) rules (47 C.F.R. §§64.2001-64.2011). Certification of the Cooperative's compliance with CPNI rules and a description of the Cooperative's operating procedures that ensure compliance are filed at the FCC annually.

LINE 610 - ABILITY TO FUNCTION IN EMERGENCY SITUATIONS

Brazos Telephone Cooperative, Inc. is able to function in emergency situations. The Cooperative has a reasonable amount of back-up power to ensure functionality without an external power source. Standby power generators are supplied at the central office, remote switch sites, and repeater sites to ensure functionality without an external power source until power is restored. The network is capable of managing traffic spikes resulting from emergency situations.

The Cooperative is able to reroute traffic around damaged facilities. Although the Cooperative's ability to reroute traffic around damaged facilities is not absolute and may be limited in certain circumstances, there is a restoration plan in place for expeditious recovery of service, including splicing of damaged facilities when warranted.

LINE 1010 - VOICE SERVICES RATE COMPARABILITY

The Wireline Competition Bureau's most recent reasonable comparability benchmark for voice services is \$46.96, which includes the federal subscriber line charge ("SLC").1

In the exchanges served by Brazos Telephone Cooperative, Inc. ("the Cooperative"), the highest single-line residential local rate, including any mandatory extended area service charge, is \$22.43. When the federal SLC (\$6.50) and the state universal service fee (\$.83) are included, the rate becomes \$29.76. Therefore, the Cooperative's pricing of fixed voice services is less than the reasonable comparability benchmark of \$46.96.

¹ Wireline Competition Bureau Announces Results of Urban Rate Survey for Voice Services; Seeks Comment on Petition for Extension of Time to Comply With New Rate Floor, WC Docket No. 10-90, DA 14-384 (rel. Mar. 20, 2014), p. 2.



Independent Auditor's Report

The Board of Directors Brazos Telephone Cooperative, Inc. Olney, Texas

We have audited the accompanying consolidated financial statements of Brazos Telephone Cooperative, Inc., which comprise the balance sheets as of December 31, 2013 and 2012, and the related consolidated statements of operations, comprehensive income, changes in members' equity, and cash flows for the years then ended, and the related notes to the financial statements.

Management's Responsibility for the Financial Statements

Management is responsible for the preparation and fair presentation of these financial statements in accordance with accounting principles generally accepted in the United States of America; this includes the design, implementation, and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

Auditor's Responsibility

Our responsibility is to express an opinion on these financial statements based on our audits. We conducted our audits in accordance with auditing standards generally accepted in the United States of America. Those standards require that we plan and perform the audits to obtain reasonable assurance about whether the financial statements are free from material misstatement.

An audit involves performing procedures to obtain audit evidence about the amounts and disclosures in the financial statements. The procedures selected depend on the auditor's judgment, including the assessment of the risks of material misstatement of the financial statements, whether due to fraud or error. In making those risk assessments, the auditor considers internal control relevant to the entity's preparation and fair presentation of the financial statements in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the entity's internal control. Accordingly, we express no such opinion. An audit also includes evaluating the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluating the overall presentation of the financial statements.

We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Opinion

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of Brazos Telephone Cooperative, Inc. as of December 31, 2013 and 2012, and the results of its operations and its cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Change in Accounting Principle

As discussed in Note 12 to the financial statements, management has elected to change its policy for accounting for the investment in cellular entities in 2013. Our opinion is not modified with respect to that matter.

Curtis Blakely + Co, P.C. Longview, Texas

April 4, 2014

BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED BALANCE SHEETS December 31

Assets

Current Assets:

Cash and cash equivalents
Temporary investments
Accounts receivable
Accrued unbilled revenue
Materials and supplies
Prepaid income taxes
Other prepayments
Deferred income taxes

Total Current Assets

Property, Plant, and Equipment: Plant in service Plant under construction

Total Property, Plant, and Equipment

Less: Accumulated depreciation

Net Property, Plant, and Equipment

Investments and Other Assets: Investment in cellular entities Other Investments Deferred charges

Total investments and Other Assets

Total Assets



BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED BALANCE SHEETS December 31

Liabilities and Equities

Current Liabilities:

Current maturities of long-term debt Accounts payable Accrued income taxes Accrued taxes Accrued interest Accrued compensated absences

Other accrued liabilities Customer deposits

Total Current Liabilities

Long-Term Debt, Less Current Maturities: CoBank mortgage notes

Other Liabilities and Deferred Credits: Deferred income taxes Accrued postretirement benefits

Total Other Liabilities and Deferred Credits

Members' Equities:

Memberships
Patronage capital assigned
Patronage capital assignable
Accumulated other comprehensive income:
Unrecognized postretirement benefit costs

Total Equities

Total Liabilities and Equities



BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED STATEMENTS OF OPERATIONS For the Years Ended December 31

Operating Revenues:

Local network services
Network access services
Long distance network services
Internet revenue
Miscellaneous
Less: Uncollectible recoveries (revenues)
Total Operating Revenues

Operating Expenses:

Plant specific operations
Plant nonspecific operations
Depreciation and amortization
Customer operations
Corporate operations
Long distance expenses
Internet expenses
Other operating expenses
Total Operating Expenses

Operating Taxes:

Income taxes
Other operating taxes
Total Operating Taxes

Operating Margin

Nonoperating Margin:

Interest and dividend income Cellular entities' distributions Other nonoperating expense Income taxes Total Nonoperating Margin

Margin Before Interest Charges

Interest Charges: Interest expense Capitalized interest Total Interest Charges

Net Margin



BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED STATEMENTS OF COMPREHENSIVE INCOME For the Years Ended December 31

Net Margin \$ Other Comprehensive Income: Postretirement health plan benefits: Actuarial gain (loss) arising Reclassification of prior year comprehensive income amounts included in current year net income

Comprehensive Income

BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED STATEMENTS OF CHANGES IN MEMBERS' EQUITY For the Years Ended December 31

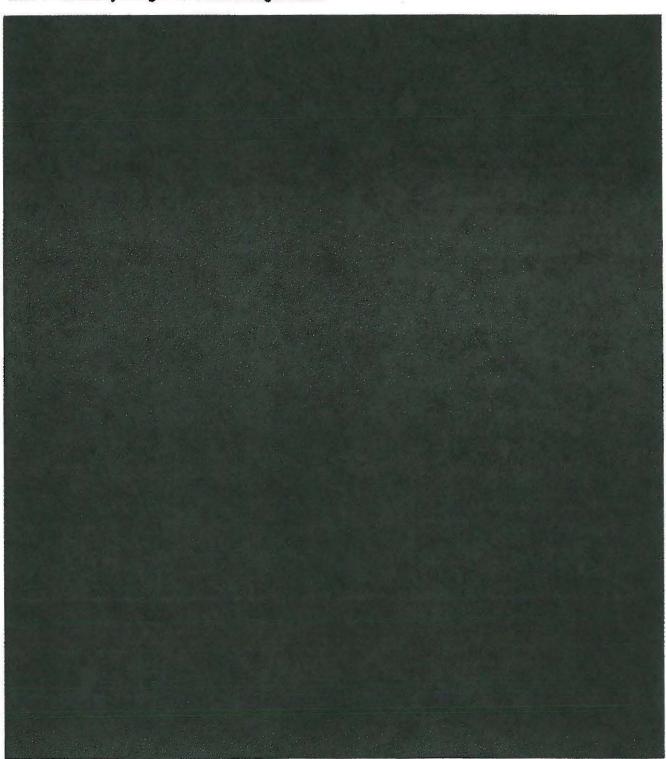
	Memberships	Patronage Capital Assignable	Patronage Capital Assigned	Accumulated Other Comprehensive Income	<u>Total</u>
Balance, January 1, 2012 as Previously Reported	\$				
Prior Period Adjustment, Change In Accounting Principle					
Balance, January 1, 2012 as Restated					
Patronage Capital Assigned					
Net Margin					
Actuarial Gain (Loss) Arising					
Amounts Reclassified From Accumulated Other Comprehensive Income					
Memberships Refunded					
Retirements					
Balance, December 31, 2012					
Patronage Capital Assigned					
Net Margin					
Actuarial Gain (Loss) Arising					
Amounts Reclassified From Accumulated Other Comprehensive Income					
Memberships Refunded					
Retirements					
Balance, December 31, 2013	\$				

BRAZOS TELEPHONE COOPERATIVE, INC. CONSOLIDATED STATEMENTS OF CASH FLOWS For the Years Ended December 31

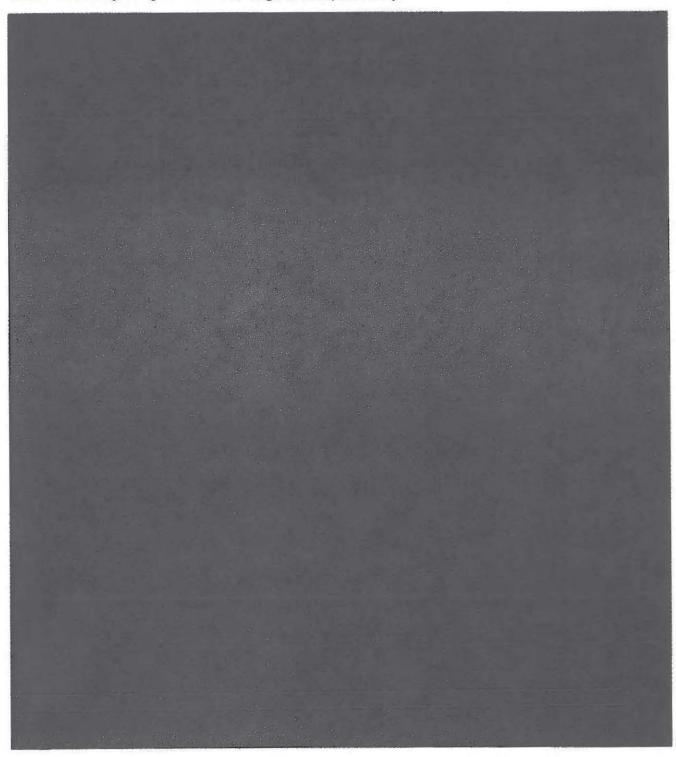
2013 2012 Cash Flows from Operating Activities: Net margin Adjustments to reconcile net margin to net cash provided by operating activities: Depreciation and amortization Patronage capital certificates received Loss on disposal of equipment Change in assets and liabilities: Accounts receivable Prepaids and deferred charges Deferred tax assets Accounts payable and accruals Deferred tax liabilities and deferred credits **Total Adjustments** Net Cash Provided by Operating Activities Cash Flows from Investing Activities: Capital expenditures Proceeds from sales of assets Change in temporary investments Net Cash Provided by (Used in) Investing Activities Cash Flows from Financing Activities: Payments of long-term debt Proceeds from cushion of credit Memberships refunded Patronage capital retired Net Cash Used in Financing Activities Net Increase in Cash and Cash Equivalents Cash and Cash Equivalents at Beginning of Year

Cash and Cash Equivalents at End of Year

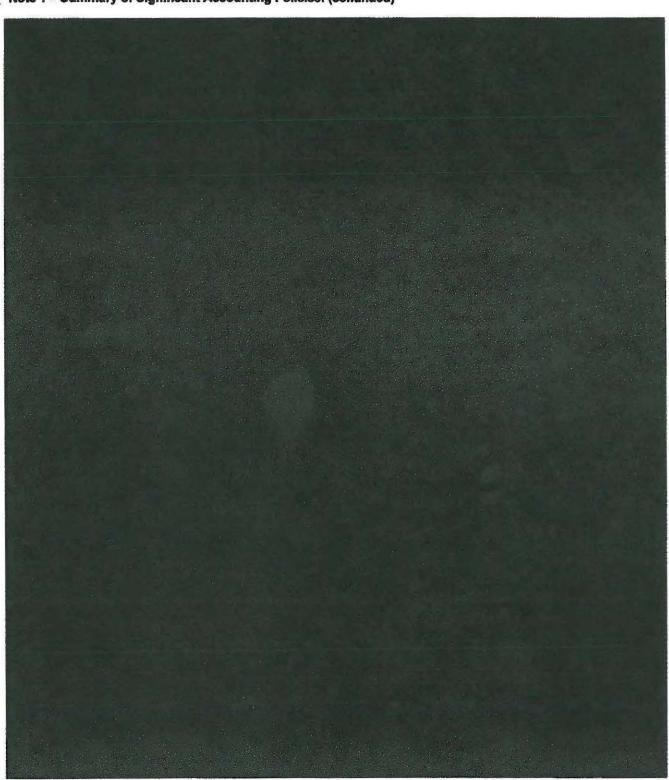
Note 1 - Summary of Significant Accounting Policies:

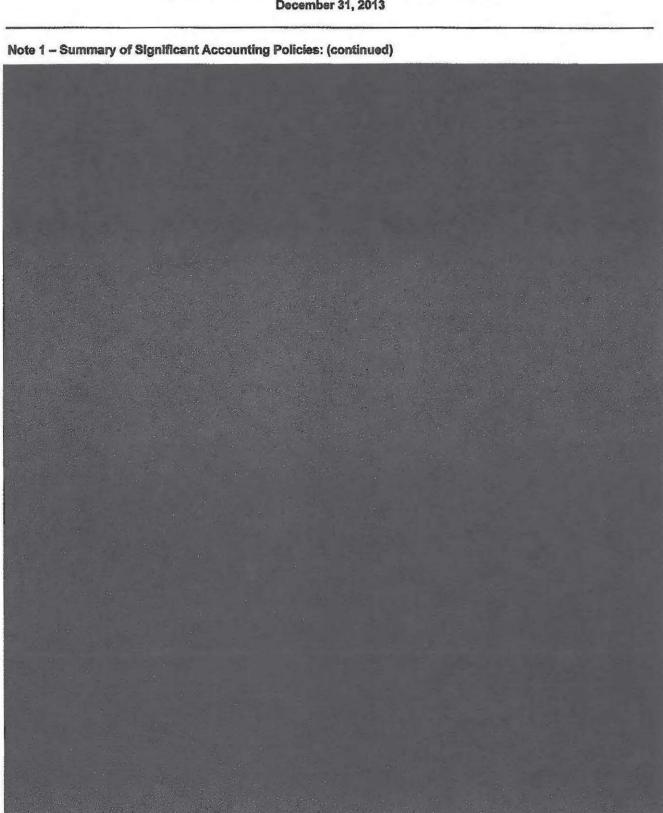


Note 1 - Summary of Significant Accounting Policies: (continued)

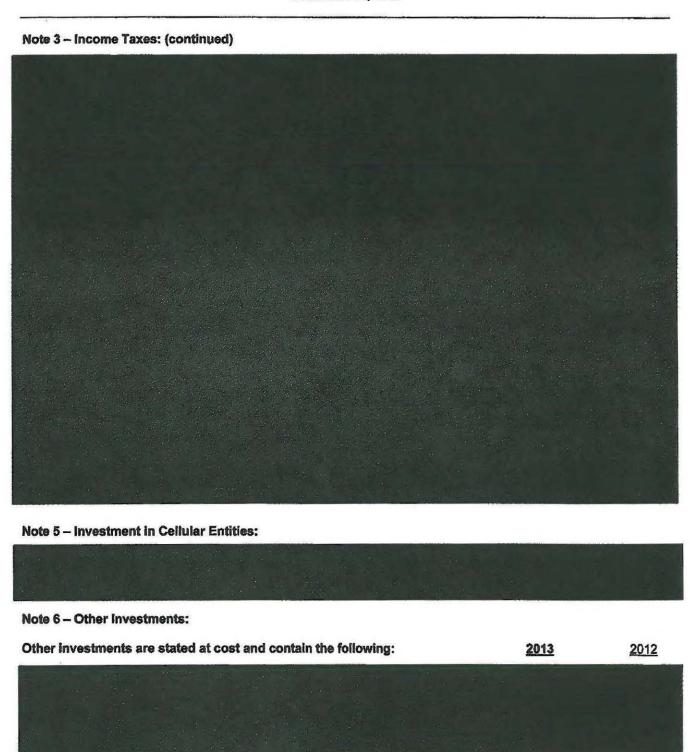


Note 1 - Summary of Significant Accounting Policies: (continued)

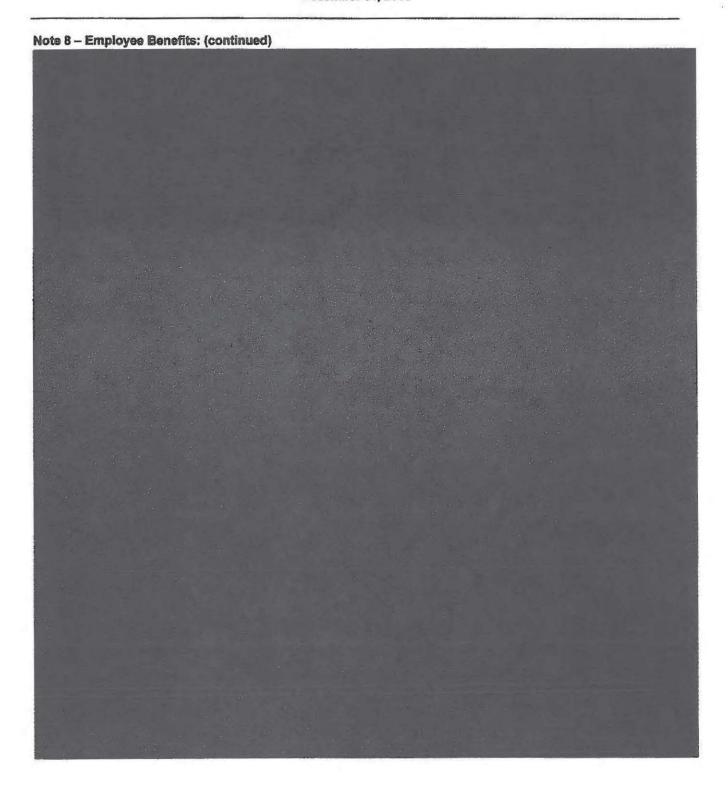


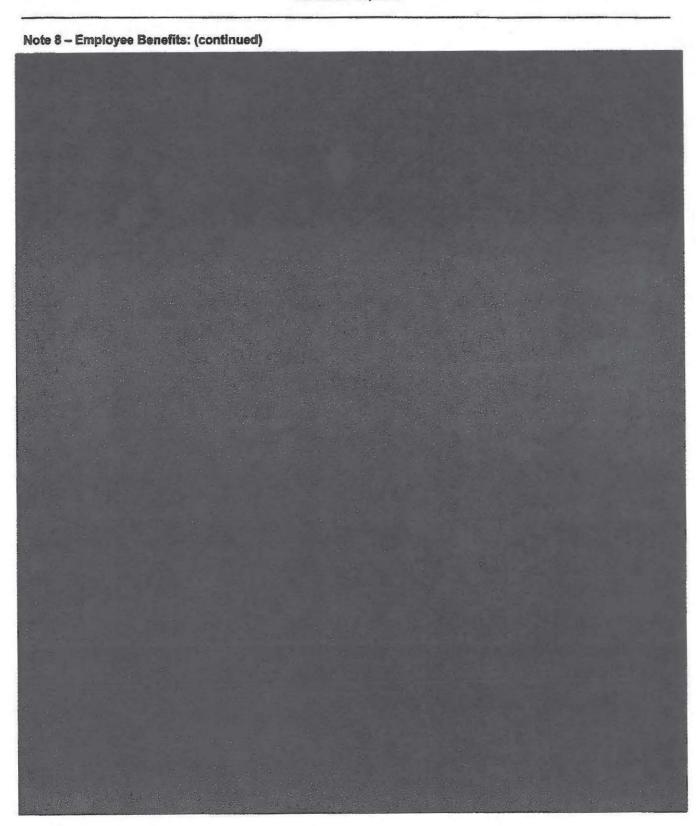


ote 1 – Summary of	Significant Accour	nting Policies: (con	tinued)		
te 2 - Accrued Uni	oilled Revenue:	Paragoni modale som a seminari	Water Process of the Control of the		
					and a training
ote 3 – Income Taxe					
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Note 6 - Other Investments: (continued	d)	*		
Note 7 - Long-Term Debt:		, and a second		
			2	
Note 8 - Employee Benefits:				
Savings Plan				- Common





Note 10 – Financial Instruments:	
	OF STREET
Note 11 – Commitments and Contingencies:	- 26WSH

ote 11 – Commitment					
ote 12 – Change in Ad	counting Princip	ile:		1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1. 1	
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ote 13 – Reclassificat	ion Out of Accum	nulated Other Co	mprehensive Inco	me:	
ote 13 – Reclassificat	ion Out of Accum	nulated Other Co	mprehensive Inco	me:	
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